Case 1:19-cv-07485-GBD Document 28 Filed 03/26/20 Page 1 of 1

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510 New York, New York 10165

.....

Telephone: (212) 317-1200 Facsimile: (212) 317-1620

jbarton@faillacelaw.com

USDC SDNY DOC MENT

ELECTRONICALLY FILED

March 26, 2020

BY ECF

Hon. Judge George B. Danie ATE FILES.
United States District Judge

Daniel Patrick Moynihan United States Courthouse 500 Pearl St.

New York, NY 10007-1312

SO ORDERED:

egrge B. Daniels, U.S.D.J

Dated:_

<u>MAR 2 6 2020</u>

Re:

Candido Cano et al v. Xing Fu, Inc. et al.;

Case No. 19-cv-07485-GBD

Your Honor:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiffs in the above-referenced matter. I write to respectfully request a 30-day extension to submit the motion for settlement approval, which is currently due on March 27, 2020. This is the first request of its kind and is submitted on consent.

The parties have been working diligently to finalize the settlement agreement, but anticipate needing more time to complete it. In addition, due to the COVID-19 pandemic, the parties expect some difficulty in obtaining signatures on the agreement. As such, the parties respectfully request that the deadline to submit the motion for settlement approval be adjourned by thirty days.

Respectfully Submitted,

/s/Jesse Barton
Jesse Barton
Michael Faillace & Associates, P.C.
Attorneys for Plaintiff